

Chad E. Adams
Hallee C. Frandsen
Browning, Kaleczyc, Berry & Hoven, P.C.
800 N. Last Chance Gulch, Suite 101
P.O. Box 1697
Helena, MT 59624
Telephone: (406) 443-6820
Facsimile: (406) 443-6883
chad@bkbh.com
hallee@bkbh.com

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

NATHANIEL LAKE,

Plaintiff,

v.

CORECIVIC, LLC, d/b/a
CROSSROADS CORRECTIONAL
CENTER; WARDEN PAT MCTIGHE;
TODD HORN and DOES 1-10

Defendants.

Case No. 4:21-CV-00116-BMM-JTJ

**FOUNDATIONAL AFFIDAVIT
OF CHAD E. ADAMS**

STATE OF MONTANA)

: ss.

County of Lewis & Clark)

I, Chad E. Adams, declare under penalty of perjury that the following is true
and correct:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts involved in this matter.

2. I am counsel for CoreCivic Defendants in this matter.

3. During discovery, Defendants sent its First Set of Discovery Requests to Plaintiff requesting information and documentation regarding Plaintiff's medical conditions and reports. A true and correct copy of Defendants' First Set of Discovery Requests is attached hereto as Exh. D.

4. Defendants provided Plaintiff with its initial Expert Witness Disclosure per the Court's Scheduling Order, which noted the lack of damages documentation received by Plaintiff. A true and correct copy of Defendants' Expert Witness Disclosure is attached hereto as Exh. B.

5. Plaintiff provided responses to Defendants' First Set of Discovery Requests indicating he would supplement a large portion of medical reports and health history upon receipt. A true and correct copy of Plaintiff's Responses to Defendants' First Set of Discovery is attached hereto as Exh. E.

6. Following Defendants' disclosure of its Expert Witness, Plaintiff contacted Defendants requesting a general extension of the joint schedule. A true and correct copy of Plaintiff's email communication to Defendants' counsel is attached hereto as Exh. C. At that time, Plaintiff had not provided Defendants with his Expert Witness Disclosure.

7. Defendants sent Plaintiff a Second Set of Discovery Requests asking for information and documentation regarding Plaintiff's damages claims. A true and correct copy of Defendants' Second Set of Discovery Requests is attached hereto as Exh. F.

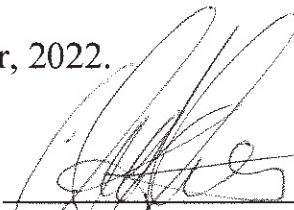
8. After Plaintiff's failure to supplement medical records and health history, and for Plaintiff's failure to respond to Defendants' Second Set of Discovery Requests, Defendants met and conferred with Plaintiff through correspondence in an attempt to resolve these discovery grievances outside the Court. A true and correct copy of the meet and confer correspondence is attached hereto as Exh. G. Plaintiff has failed to respond to Defendants in any respect.

9. Defendants supplemented the expert witness disclosure and report and provided it to Plaintiff per the Court's Joint Amended Discovery Plan. A true and correct copy of Defendants' Supplemental Expert Witness Disclosure is attached here to as Exh. A.

10. I have read the foregoing and believe that the facts and statements contained therein are true and correct to the best of my knowledge.

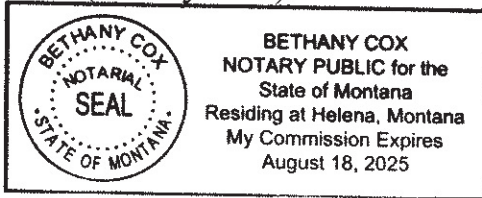
Further your affiant sayeth naught.

DATED this 16th day of December, 2022.


Chad E. Adams

Subscribed and sworn to before me this 16th day of December, 2022.

(Notary Seal)



Bethany Cox
Notary Public for the State of Montana